

**From:** [Linner, Susan](#)  
**To:** [Matt Kales](#); [Pat Deibert](#)  
**Cc:** [Creed Clayton](#); [Terry Ireland](#)  
**Subject:** Re: Review draft: vulnerability/DC concept  
**Date:** Monday, March 31, 2014 9:56:53 AM

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Matt and Pat,  
here are our comments. Will be happy to discuss these with you at 11:00.

Susan

- In Colorado, PACs and PPH are synonymous and cover more than half of the GRSG range in Colorado. Restricting new development to only Valid Existing Rights (VER) in this large area would tie BLM's hands significantly and create more incentives for development on adjacent/ intermingled private lands that could have significant negative effects on the species. This also does not appear to be consistent with the NTT, which recommends a 3 percent disturbance cap on PPH.
- It is unclear if the prohibition on new disturbance other than VER in the vulnerable populations includes all habitats, or only PPH. If it includes all habitats, then the only new development allowed on BLM land in NW Colorado would be in PGH within non-vulnerable populations. That is extremely restrictive and likely untenable for BLM. We also have a concern with including the Colorado portion of the Laramie population in this category as there are no known leks in Colorado and contribution of viability to the larger part of the Laramie population in Wyoming may have always been limited
- While we understand that it can be somewhat confusing to evaluate the various recommendations in the plans, we still believe that the best approach to conservation of the species is working with the local wildlife and resources experts in CPW and BLM to craft local solutions. Given that the species status has remained stable in Colorado for at least the last couple decades, these measures will be perceived as out of proportion to conservation needs of the species.
- Overall, implementation of this concept would create a significant backlash from the public and likely also damage our relationship with our BLM, USFS, and State partners. There is also likely to be a perception that Wyoming is being treated differently than the rest of the states. In addition, making such a significant change at this late date would ensure that the NW CO plan would not be completed in a timely manner. To remain on schedule, it must be delivered to the State Office by the end of April.

On Fri, Mar 28, 2014 at 2:08 PM, Matt Kales <[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)> wrote:

Folks,

Thanks again for your time this morning and, per that conversation, please see attached the subject document, along with some supplemental information Pat provided. As discussed, **please send Pat and me any/all comments by 1100 MST on Monday, 3/31**. To limit the amount of comments we'll need to reconcile, we ask you please focus your review on the most substantive items in the document.

We've got a placeholder on the calendar for a follow-up call as necessary on Monday at 1100 MST on Monday (3/31) to discuss as necessary any outstanding concerns. We'll

determine here – based on the nature and volume of comments – whether we need to hold that call. **If you don't hear from us, assume the call is on.** Call information is below.

Lastly, for efficiency, this distribution includes those folks who took the call this morning (not the entire FMT). If someone else in your shop needs to be looped or will actually conduct the review, please feel free to share this and provide context; otherwise, please don't distribute this further at this time.

Thanks in advance, and please Pat or me know if you have any immediate questions. Have a good weekend.

Matt

**FWS SG FMT Call, Monday, March 31, 2014, 1100 MST; 877-901-6917, passcode 4401420#**

**Matt Kales**

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